

U.S. DEPARTMENT OF THE INTERIOR

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

# Management Directive 715 Plan

Reporting Period October 1, 2006 – September 30, 2007





THE ASSOCIATE DEPUTY SECRETARY OF THE INTERIOR  
WASHINGTON

SEP 11 2008

Mr. Carlton M. Hadden  
Director, Office of Federal Operations  
U.S. Equal Employment Opportunity Commission  
1801 L Street, NW  
Washington, D.C. 20507

Dear Mr. Hadden:

The U.S. Department of the Interior's Annual Equal Employment Opportunity Program Status Report for Fiscal Year 2007 is attached. The report was prepared in accordance with guidelines in the U.S. Equal Employment Opportunity Commission Management Directive 715. The attached Book I is the Departmental report. The Department's subordinate components' reports are in Books II, III, and IV and will be forwarded under separate cover.

The Department is working diligently to achieve and maintain a Model EEO Program. In pursuit of this objective, the Department continues to review employment policies and practices, identify potential barriers, and implement strategies to overcome those barriers. Some of the strategies implemented during FY 2007 included development of new EEO and human resources policies and guidance, expansion of the Department-wide alternate dispute resolution program, expansion of the Department Learning Management System, evaluation of dispositions on reasonable accommodation requests, implementation of an exit interview for departing employees, recertification of employees' race, ethnicity, and disability status, training of managers, supervisors, and employees on EEO, diversity, and HR topics, training of EEO and HR practitioners, and establishment of collaborative partnerships with employee-focused groups, Federal interagency taskforces, professional organizations, and minority institutions of higher education.

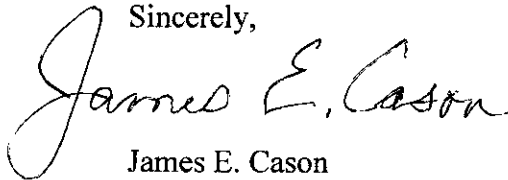
During FY 2007, the Department was successful in meeting some previously unmet compliance measures within Essential Element B, Integration of EEO into Agency's Strategic Mission, and Essential Element C, Management and Program Accountability. Also during FY 2007, workforce demographics reflected increases in the participation rates of women, minorities, and employees with disabilities within the Occupational Category "Officials and Managers" and in mission critical occupations.

As indicated in the attached report, the Department continues to address the challenges of attaining a Model EEO Program through its efforts to improve early resolution of conflict within the workplace, implement adequate data collection and tracking systems, and provide timely EEO counseling, investigation, and final agency decisions. The Department is committed to

achieving and maintaining a discrimination-free work environment that provides equal opportunity for all employees to realize their full potential.

We look forward to your feedback on the Department's Annual EEO Program Status Report. If you have comments regarding this report, you may contact Ophelia Anderson, Chief, Diversity and Program Compliance Division, Office of Civil Rights, at (202) 219-0805 or email <ophelia\_anderson@ios.doi.gov>.

Sincerely,

A handwritten signature in cursive script that reads "James E. Cason". The signature is written in black ink and is positioned above the printed name.

James E. Cason

Enclosure

**EEOC FORM  
715-01 PART A - D**

**U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

**For period covering October 1, 2006 to September 30, 2007**

<b>PART A</b>  Department or Agency Identifying Information	<b>1. Agency</b>		<b>1. U.S. Department of the Interior</b>	
	1.a. 2 <sup>nd</sup> level reporting component			
	1.b. 3 <sup>rd</sup> level reporting component			
	1.c. 4 <sup>th</sup> level reporting component			
	<b>2. Address</b>		<b>2. 1849 C Street, NW</b>	
	<b>3. City, State, Zip Code</b>		<b>3. Washington, DC 20240</b>	
	<b>4. CPDF Code</b>	<b>5. FIPS code(s)</b>	<b>4. IN01</b>	<b>5. 1405</b>
<b>PART B</b>  Total Employment	<b>1. Enter total number of permanent full-time and part-time employees</b>			<b>1. 57,165</b>
	<b>2. Enter total number of temporary employees</b>			<b>2. 15,835</b>
	<b>3. Enter total number employees paid from non-appropriated funds</b>			<b>3. Not Applicable</b>
	<b>4. TOTAL EMPLOYMENT [add lines B 1 through 3]</b>			<b>4. 73,000</b>
<b>PART C</b>  Agency Official(s) Responsible For Oversight of EEO Program(s)	<b>1. Head of Agency Official Title</b>		<b>1. Dirk Kempthorne Secretary</b>	
	<b>2. Agency Head Designee</b>		<b>2. James E. Cason Associate Deputy Secretary</b>	
	<b>3. Principal EEO Director/Official Official Title/series/grade</b>		<b>3. Sharon D. Eller Director, Office of Civil Rights</b>	
	<b>4. Title VII Affirmative EEO Program Official</b>		<b>4. Ophelia Anderson Chief, Diversity &amp; Program Compliance Div</b>	
	<b>5. Section 501 Affirmative Action Program Official</b>		<b>5. Acquanetta Newson Disability Program Manager</b>	
	<b>6. Complaint Processing Program Manager</b>		<b>6. Alvin Dillings Chief, Employment Complaints &amp; Adjudication Div</b>	
	<b>7. Other Responsible EEO Staff</b>		<b>Jack Andre, Chief, Public Civil Rights Div</b>	
			<b>Sylvia Jones, Special Emphasis Program &amp; Minority Serving Institutions Program Manager</b>	

**EEOC FORM  
715-01 PART A - D  
U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>PART D</b>	<b>Subordinate Component and Location (City/State)</b>	<b>CPDF and FIPS codes</b>	
List of Subordinate Components Covered in This Report	Office of the Secretary	IN-01	1405
	Bureau of Indian Affairs	IN-06	
	Bureau of Land Management	IN-05	
	Bureau of Reclamation	IN-07	1425
	Fish and Wildlife Service	IN-15	1458
	Minerals Management Service	IN-23	5999
	National Park Service	IN-10	
	Office of Surface Mining	IN-22	
	Geological Survey	IN-08	1434

**EEOC FORMS and Documents Included With This Report**

*Executive Summary [FORM 715-01 PART E], that includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01PART G]	X
Brief paragraph describing the agency's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement	X
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier	X
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]	X
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	X
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.	
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	
*Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements	X	*Organizational Chart	X

U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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U.S. Department of the Interior  
For Period Covering October 1, 2006 to September 30, 2007

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## EXECUTIVE SUMMARY

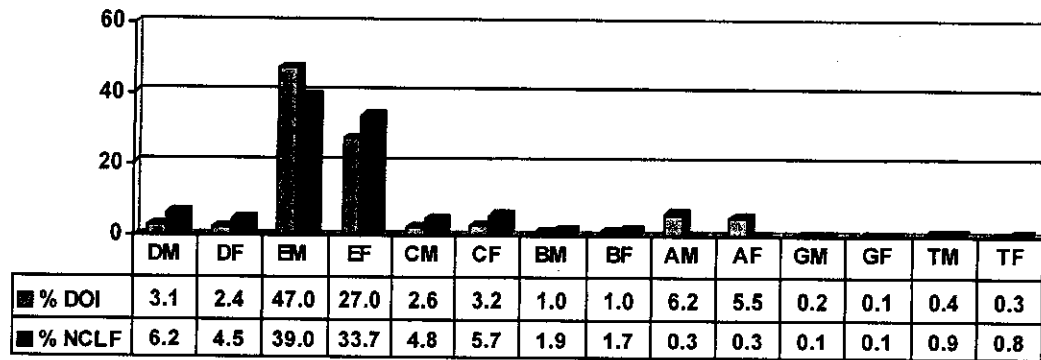
The U.S. Department of the Interior (Department) is America's principal conservation agency. Its mission is to protect and provide access to the Nation's natural and cultural heritage and honor trust responsibilities to Indian tribes and commitments to island communities. To fulfill its mission, the Department strives to manage for a workforce that is diverse, highly skilled, accountable, modern, functionally integrated, citizen centered and results oriented.

The Department is working diligently to achieve and maintain a Model Equal Employment Opportunity (EEO) Program. In pursuit of this objective, the Department continues to review employment policies and practices, identify potential barriers, and implement strategies to overcome those barriers. Some of the strategies implemented during Fiscal Year (FY) 2007 included: development of new EEO and human resources (HR) policies and guidance; expansion of the Alternate Dispute Resolution program; expansion of the Department Learning Management System; evaluation of dispositions on reasonable accommodation requests; implementation of an exit interview for departing employees; recertification of employees' race, ethnicity, and disability status; training of managers, supervisors, and employees on EEO, diversity, and HR topics; training of EEO and HR practitioners; and establishment of collaborative partnerships with employee-focused groups, Federal interagency taskforces, professional organizations, and minority institutions of higher education.

As of September 30, 2007, the Department's workforce included 57,165 permanent employees and 15,835 temporary employees for a total of 73,000 employees. The permanent workforce was comprised of 89% general schedule employees and 11% wage grade employees.

Statistical data by race and ethnicity of the permanent workforce showed 74.0% White, 5.5% Hispanic, 5.8% African American, 2.0% Asian, 11.7% American Indian/Alaska Native, 0.3% Native Hawaiian/Other Pacific Islander, and 0.7% Two or More Races. The permanent workforce included 39.5% women, 25.9% minorities, and 7.3% employees with disabilities. Employees with targeted disabilities made up 1.0% of the permanent workforce.

The Department experienced a 2.2% reduction in its permanent workforce during FY 2007. Workforce statistics reflected that White males, American Indian/Alaska Native males and females, and Native Hawaiian/Other Pacific Islander males and females met or exceeded the National Civilian Labor Force (NCLF) benchmark. All other groups remained below the NCLF. The following graph compares the participation rate of employee groups within the Department's permanent workforce to the groups' participation in the NCLF.



**Race/Ethnicity/Gender Designations:**

DM/DF Hispanic male/female

EM/EF White male/female

CM/CF African American male/female

BM/BF Asian male/female

AM/AF American Indian/Alaska Native male/female

GM/GF Native Hawaiian/Other Pacific Islander male/female

TM/TF Two or More Races male/female

DOI data taken from the Federal Personnel and Payroll System, as of September 30, 2007.

NCLF data taken from the 2000 Census.

During FY 2007, the Department experienced incremental increases in the participation rates of women, minorities, and employees with disabilities within the Occupational Categories “Officials and Managers.” The Executive/Senior Level (grades 15 and above) had an increase in participation of Hispanic males, African American females, American Indian/Alaska Native females, and employees with targeted and non-targeted disabilities. The Mid-level (grades 13-14) had an increase in participation of Hispanic females, White females, African American females, American Indian/Alaska Native females, and employees with non-targeted disabilities.

Workforce data showed slight increases in the participation rates of minorities, White women, and employees with disabilities in the Department’s eight mission critical occupations. The increase in participation rates, by occupation, occurred as follows. Park Ranger, General Biology, Wildlife Biology, Geology, and Education and Vocational Training showed increases in minorities, White women, and employees with non-targeted disabilities. Civil Engineering showed increases in minorities, White women, and employees with targeted disabilities. Realty showed increases in minorities and employees with targeted and non-targeted disabilities. Hydrology showed increases in minorities and White women. Some groups continued to have low participation in the mission critical occupations.

The FY 2007 Self-Assessment Checklist Measuring Essential Elements of the Model EEO Program (EEOC Form 715-01, Part G) indicated that the Department was successful in meeting some previously unmet compliance measures within Essential Element B, Integration of EEO into Agency’s Strategic Mission, and Essential Element C, Management and Program Accountability. Newly met measures indicated: 1) sufficient funding has been provided for the posting of written materials in HR and EEO offices; and 2) disability accommodation decisions were reviewed to ensure compliance with Departmental policy and identify trends and problems.

Also, the self-assessment reflected that the Department continued to face challenges in meeting compliance measures related to the following: early resolution of conflict within the work environment; inclusion of EEO Directors in the agency’s strategic planning; allocation of sufficient resources to the EEO Program; implementation of adequate data collection and tracking systems; and provision of timely EEO counseling, investigations, and final agency decisions. To help overcome these challenges, planned activities have been identified in Parts H, I, and J of this report.

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EEOC FORM  
715-01 PART F  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

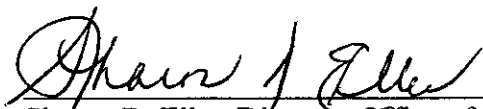
**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Sharon D. Eller, am the Principal EEO Director for the Department of the Interior.

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEOC MD-715. If an essential element was not fully compliant with the standards of EEOC MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

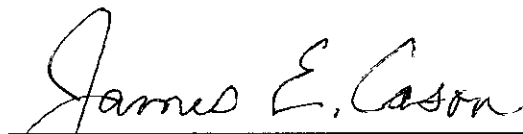
I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



Sharon D. Eller, Director, Office of Civil Rights  
Signature of Principal EEO Director/Official

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEOC MD-715.

29 July 2008  
Date



James E. Cason, Associate Deputy Secretary  
Signature of Agency Head Designee

SEP 11 2008  
Date



EEOC FORM  
715-01 PART H  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**EEO Plan To Attain the Essential Elements of a Model EEO Program**

**FY 2007**

**Department of the Interior**

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #1:	<p>Essential Element A: Demonstrated Commitment from Agency Leadership Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.</p> <p>Common DOI Deficiency – There is no consistency in issuing annual equal employment opportunity (EEO) policies to employees, managers, and supervisors. New managers and supervisors are not provided a copy of EEO policy statements upon their appointment or promotion to supervisory status.</p>
OBJECTIVE:	Improve communication and understanding of equal opportunity policies through training, annual reminders, new employee orientation, and distribution of policies to employees, managers and supervisors. This includes policies on EEO, including Zero Tolerance, Policy on Sexual Harassment and Hostile Work Environment Harassment, and Policy on Reasonable Accommodation.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights; Director, Office of Human Resources; Director, Collaborative Action & Dispute Resolution; Director, DOI University; Director, Strategic Workforce Development; EEO and HR Offices
DATE OBJECTIVE INITIATED:	January 31, 2005
TARGET DATE FOR COMPLETION OF OBJECTIVE:	Modified Date: September 30, 2008
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE
1) EEO Offices will ensure that annual reminders (EEO policies and memos) are prepared and distributed to all employees electronically via the intranet.	September 30, 2006 Modified Date: September 30, 2008
2) The Office of Human Resources (OHR) and the Office of Civil Rights (OCR) will establish a taskforce to determine 1) what EEO/HR policies should be provided to new employees and newly appointed supervisors and 2) the most effective method to distribute the policies to new employees and supervisors.	September 30, 2006 <b>Completed June 2008</b>
3) The OCR and OHR will prepare a new Departmental policy on competitive sourcing considerations for persons with disabilities and post electronically for access by all managers, supervisors, and employees.	September 30, 2007 <b>Completed May 2007</b>

4) The OCR will prepare a new Departmental anti-harassment policy and post electronically for access by managers, supervisors, and employees.	September 30, 2007 <b>Completed May 2008</b>
5) The OHR will issue a new policy on reassignment as a last resort form of reasonable accommodation for qualified persons with disabilities and post electronically for access by all managers, supervisors, and employees.	September 30, 2008 <b>Completed May 2008</b>

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

- 1) Seven out of nine of the DOI components provide written materials on EEO programs to employees and applicants and have posted such materials in EEO and HR offices and on the internet/intranet.
- 2) The OHR/OCR Taskforce was expanded to include the Office of Collaborative Action & Dispute Resolution, Solicitor's Office, DOI University, and the Office of Strategic Workforce Development. The taskforce, renamed the Barrier Analysis Workforce Group (BAWG), will meet quarterly to address the identification, examination, and removal of barriers to executing the MD 715 action items. The BAWG will endeavor to institute a DOI-wide alignment to move the MD 715 Plan forward.
- 3) The DOI policy on Competitive Sourcing for Persons with Disabilities was established and distributed to all managers, supervisors, and employees. The policy requires that the work of persons who are currently on a Schedule A appointment for individuals with severe physical disabilities, psychological disabilities, or individuals with mental retardation, and veterans with a compensable service connected disability of 30% or more who are currently on a temporary or term appointment be excluded from competitive sourcing studies.
- 4) The Secretary's Anti-Harassment Policy, effective May 22, 2008, was distributed electronically to all employees. The policy addresses both sexual and nonsexual harassment and emphasizes that all senior executives, managers, and supervisors must continue to enforce the policy throughout the DOI.
- 5) The OHR developed new guidance on how to facilitate reassignment as a last resort form of reasonable accommodation for qualified employees with disabilities. The guidance, effective May 5, 2008, was distributed DOI-wide for immediate implementation by management and HR practitioners.

EEOC FORM  
715-01 PART H  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**EEO Plan To Attain the Essential Elements of a Model EEO Program**

**FY 2007**

**Department of the Interior**

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #2:	<p>Essential Element B: Integration of EEO into the Agency's Strategic Mission Requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission.</p> <p>Common DOI Deficiency - Based on feedback from EEO offices and information on management policies and practices within the bureaus, there may be a misconception that EEO policy and programs do not play a "value-added" role in the agency's strategic mission.</p>	
OBJECTIVE:	Evaluate the Department's EEO Program posture so it is strategically aligned with the agency's mission resulting in an improved perception.	
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights; Bureaus/Offices Human Capital Officers; EEO Officers; Managers & Supervisors	
DATE OBJECTIVE INITIATED:	January 31, 2004	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2005 Modified Date: June 30, 2009	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE	
1) EEO offices will prioritize training in the areas of EEO, diversity, reasonable accommodation and disability laws, and alternate dispute resolution for managers and supervisors.	September 30, 2006 Modified Date: September 30, 2008	
2) Human Capital officers, or appropriate official, will submit for budget consideration funding for the allocation of personnel to implement EEO Program strategies and initiatives.	June 15, 2008 Modified Date: June 30, 2009	
3) Bureau Human Capital officers will ensure that all human capital issues, to include EEO and Diversity, are addressed at strategic planning meetings of senior management officials and at regular meetings with bureau representatives.	September 30, 2008	
4) OCR will review bureaus' MD 715 reports to evaluate why some previously met measures were reported unmet for the FY 2007 program status report and make recommendations for improvement.	September 30, 2008	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE		

EEO offices continue to promote EEO/Diversity training for managers and supervisors. During FY 2007, all components offered on-line or classroom training in EEO, diversity, reasonable accommodation or other EEO-related topics. In addition, all employees were required to take training on Discrimination and Whistleblowing in the Workplace (No FEAR Act).

EEOC FORM  
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*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**EEO Plan To Attain the Essential Elements of a Model EEO Program**

**FY 2007**

**Department of the Interior**

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #3:	<p>Essential Element C: Management and Program Accountability Requires the agency head to hold all managers, supervisors and EEO officials responsible for effective implementation of the agency's EEO Program and Plan.</p> <p>Common DOI Deficiency – Ineffective communication and consultation exists between Human Resources and EEO staffs (i.e., in second level components) in assessing and implementing all internal policies, practices and procedures.</p>
OBJECTIVE:	To improve communication in order to engage in integrated results-oriented actions that improve overall human capital management.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights; Director, Office of Human Resources; EEO and HR Officers; Managers and Supervisors
DATE OBJECTIVE INITIATED:	January 31, 2005
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2005 Modified Date: December 30, 2008
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE
1) EEO offices will initiate periodic "state of the agency" briefing forums for senior executives or their designees on the six elements of a model EEO program.	December 30, 2005 Modified Date: December 30, 2008
2) The OHR will ensure that HR offices within the bureaus/offices are aware of their responsibilities for input into the Federal Equal Opportunity Recruitment Program (FEORP) Plan as required by 5 CFR 720.	September 30, 2007 Modified Date: September 30, 2008
3) HR and EEO offices, with input from management, will develop, implement, and report on the agency's FEORP Plan to address the recruitment, hiring and advancement of women and minorities.	October 30, 2008
4) The OHR will ensure that HR offices within the bureaus/offices are aware of their responsibilities for input into the Disabled Veterans Affirmative Action Program (DVAAP) Plan as required by 5 CFR 720.	September 30, 2007 Modified Date: September 30, 2008

5) HR and EEO offices, with input from management, will develop, implement, and report, a DVAAP Plan to address the recruitment, hiring and advancement of disabled veterans.

October 30, 2008

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**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

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- 1) Six out of nine DOI components reported they presented a "state of the agency" briefing to their senior leaders that covered all components of the annual EEO Program Status Report, including an assessment of the bureau/office's performance in each of the six elements of the Model EEO Program.
- 2) Five out of nine DOI components reported regular meetings between EEO and HR for the purpose of reviewing merit principles and procedures, employee recognition and awards, and employee development and training programs. Coordination also took place in the development of targeted recruitment plans and processing requests for reasonable accommodation.

EEOC Form  
715-01 PART H  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
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**FY 2007**

**Department of the Interior**

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #4:	<p>Essential Element D: Proactive Prevention Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.</p> <p>Common DOI Deficiency – Lack of active participation and accountability by management at all levels in identifying and assisting EEO program officials in removal of barriers to equal employment opportunity.</p>
OBJECTIVE:	To convey to management the challenges of and responsibilities associated with creating an environment of equal employment opportunity and non-discrimination.
RESPONSIBLE OFFICIAL:	Deputy Chief Human Capital Officer; Director, Office of Civil Rights; Director, Office of Human Resources; EEO and HR Officers; Managers and Supervisors; Director, Office of Collaborative Action and Dispute Resolution
DATE OBJECTIVE INITIATED:	January 31, 2005
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2005 Modified Date: March 30, 2009
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE
1) EEO and HR offices will prepare and disseminate periodic trend analyses on workforce profiles, major occupations, grade level distribution, workforce compensation and rewards system, and management/personnel policies, procedures and practices to senior management. These reports can be used in establishing performance measures.	December 30, 2005 Modified Date: December 30, 2008
2) EEO offices will utilize management level meetings and conferences to inform managers and supervisors of EEO accomplishments and challenges and to enhance understanding of their EEO responsibilities.	December 30, 2006 Modified Date: September 30, 2008
3) Annually, managers and supervisors will complete the required four hours of EEO/Diversity training in accordance with DOI policy.	September 30, 2008
4) The Office of Collaborative Action and Dispute Resolution (CADR) will ensure education and information on CORE Plus program and conflict management and ADR training are available to all managers, supervisors, and HR and EEO staffs.	March 30, 2009

5) The DCHCO will ensure that management's accountability for the implementation of EEO and Diversity strategies is identified in the new Strategic Human Capital Management Plan.	September 30, 2008
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	
<p>1) DOI's Strategic Plan, the Strategic Plan for Achieving and Maintaining a Highly Skilled and Diverse Workforce, and the newly drafted Strategic Human Capital Management Plan include EEO and diversity strategies. Continual implementation and monitoring of the results of these strategies will help DOI achieve a work environment that is free of discrimination and provides equal opportunity.</p> <p>2) Based on workforce diversity in mission critical occupations and senior grade levels and the success of diversity strategies, the DOI received a Diversity score of green for the Office of Personnel Management (OPM) Human Capital Scorecard.</p> <p>3) Significant progress has been made in the area of management's involvement in identification of employment barriers since FY 2004. Eight out of nine DOI components reported that senior managers meet and assist EEO Program officials in the identification of barriers and development of action plans to eliminate the barriers.</p> <p>4) CADR conducted a conflict management conference in January 2008. Training is on-going.</p>	



EEOC FORM  
715-01 PART H  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**EEO Plan To Attain the Essential Elements of a Model EEO Program**

<b>FY 2007</b>	
<b>Department of the Interior</b>	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #5:	<p>Essential Element E: Efficiency Requires that the agency Head ensures that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.</p> <p>Common DOI Deficiency – Lack of automated data systems necessary to conduct barrier analyses on race, national origin, disability, applicants, reasonable accommodation, EEO complaints, and training as required by the Equal Employment Opportunity Commission.</p>
OBJECTIVE:	To re-tool, upgrade, and/or create current data systems (i.e., FPPS, QuickHire, EEOR, Learning Management System, i-Complaints etc.) to address requirements of MD-715.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights; Director, Office of Human Resources; Director, National Business Center; Director, Office of Collaborative Action and Dispute Resolution; Office of Strategic Workforce Development; EEO and HR Officers
DATE OBJECTIVE INITIATED:	January 31, 2005
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2005 Modified Date: September 30, 2009
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE
1) NBC proposed to develop, or secure through vendor, a DOI-wide automated EEO database for the collection and analysis of workforce data using existing funds NBC collected for VPEDO.	December 30, 2007 Modified Date: September 30, 2008
2) NBC, OHR, and Office of Strategic Workforce Development will ensure full utilization of the Department-wide Learning Management System, DOI-Learn, to track information on training and career development programs for all employees.	January 30, 2007 Modified Date: September 30, 2008
3) EEO and HR offices will coordinate efforts to ensure that applicant flow data is being captured.	September 30, 2006 Modified Date: September 30, 2009
4) CADR will fully implement the DOI-wide alternate dispute resolution program.	September 30, 2006 Modified Date: September 30, 2008
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	

- 1) During FY 2007, the NBC developed an in-house EEO database for the collection of workforce statistics. The database was deployed to users in October 2007 in preparation for MD 715 reporting. Users of the system continue to work with NBC technicians to overcome obstacles in acquiring verifiable data from the system. Enhancements to the system are expected during FY 2008. The OCR will continue the search for data analysis software.
- 2) DOI Learn entered year two of its operation. The training and career-development tracking system provided on-line learning services to students and administrators, monitored compliance with mandatory training courses, tracked training records, and processed training approval requests. The next step to be completed is the capture of external (non-DOI) training.
- 3) CADR continued its efforts to implement the DOI-wide alternate dispute resolution system, CORE Plus. A roster of in-house neutrals was developed. Other initiatives include development of the methodology for evaluating the ADR process and the provision of conflict management training to employees. A CADR Conference was held in January 2008 to move forward on the phased roll-out of the program. Full implementation is expected by September 30, 2008.

EEOC FORM  
715-01 PART H  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**EEO Plan To Attain the Essential Elements of a Model EEO Program**

**FY 2007**

**Department of the Interior**

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #6:	<p>Essential Element E: Efficiency Requires that the agency Head ensures that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.</p> <p>DOI Deficiency – Lack of compliance reviews to evaluate the impact and effectiveness of the bureaus/offices' EEO and public civil rights programs and leadership commitment and support for these programs.</p>	
OBJECTIVE:	To assess bureaus/offices' EEO programs for compliance with EEO and civil rights laws, Executive Orders, EEOC and OPM regulations, DOJ guidance, White House Initiatives, and Departmental policies and procedures and provide recommendations for improvement.	
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights	
DATE OBJECTIVE INITIATED:	October 1, 2006	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2007 Modified Date: December 30, 2008	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE	
1) OCR will develop standard operating procedures for conducting compliance reviews of the bureaus/offices' EEO and civil rights programs.	May 30, 2007 <b>Completed June 2008</b>	
2) OCR will conduct a compliance review of a bureau/office that includes an evaluation of leadership commitment and support for the EEO and Civil Rights programs.	July 30, 2007 Modified Date: September 30, 2008	
3) OCR will provide a written assessment and recommendations for improvement to the bureau/office director.	September 30, 2007 Modified Date: December 30, 2008	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE		
<p>OCR finalized the Departmental EEO Compliance Review Checklist which will be used to conduct audits to assess the effectiveness and efficiency of components' EEO programs. The checklist encompasses measures to address compliance with Federal laws and regulations, executive orders, and DOI policies and procedures related to the processing of complaints of discrimination, affirmative employment programs, and public civil rights.</p>		

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STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY #7:

Essential Element E: Efficiency  
Requires that the agency Head ensures that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.

DOI Deficiency – Non-compliance with regulatory time frames for processing complaints of discrimination.

OBJECTIVE:

To comply with time frames in accordance with EEOC regulations for processing EEO complaints of employment discrimination.

RESPONSIBLE OFFICIAL:

Director, Office of Civil Rights; Director, Office of Human Resources; Director, Office of the Solicitor; and EEO Officers

DATE OBJECTIVE INITIATED:

October 1, 2006

TARGET DATE FOR  
COMPLETION OF OBJECTIVE:

December 30, 2007  
Modified Date: December 30, 2008

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:

TARGET DATE

1) OCR will conduct assessment of complaint processing procedures to determine where the time lag occurs within the stages of processing.

June 30, 2007  
Modified Date:  
September 30, 2008

2) OCR will develop and implement management control procedures to improve the timeliness of complaint investigations.

September 30, 2007  
Modified Date:  
September 30, 2008

3) OCR will develop and implement management control procedures to improve timeliness of final agency decisions.

September 30, 2007  
Modified Date:  
September 30, 2008

4) EEO offices will develop and distribute flyers, newsletters or other media to promote ADR/mediation as a resource for early resolution of complaints.

December 30, 2007  
Modified Date:  
December 30, 2008

5) OCR will provide professional training and certification for EEO counselors.

December 30, 2007  
Modified Date:  
September 30, 2008

6) OCR, OHR, and the Solicitor's Office will develop policy to create consistency and uniformity in settlement agreement procedures across the DOI.

December 30, 2007  
Modified Date:  
December 30, 2008

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

1. CADR developed new brochures on the Departmental alternative dispute resolution program, CORE Plus. The brochures were made available to managers, supervisors, and employees.
2. OCR continues to provide training and certification for EEO counselors. From December 2007 through June 2008, three training sessions were held and more than 150 counselors were certified.

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<b>FY 2007</b>	
<b>Department of the Interior</b>	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY #8:	<p>Essential Element E: Efficiency Requires that the agency head ensures that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process.</p> <p>There is no method in place to collect data on why some groups of employees voluntarily depart the agency at rates higher than their participation in the Department's workforce.</p>
OBJECTIVE:	To assess the reasons employees depart the agency.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights; Director, Office of Human Resources; EEO and HR Officers
DATE OBJECTIVE INITIATED:	October 1, 2005
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2007 Modified Date: June 30, 2010
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE
1) The Departmental OHR will ensure that a DOI-wide employee exit survey is developed.	October 30, 2006 <b>Completed July 2007</b>
2) HR offices will offer to all departing employees the opportunity to participate in an exit survey as part of the agency's out-processing checklist.	December 30, 2006 <b>Completed October 2007</b>
3) EEO and HR offices will analyze exit survey data and report findings on the reasons employee depart the agency and make recommendations for retention strategies.	June 30, 2010
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b>	
<p>During FY 2007, an on-line exit survey for departing employees was developed. DOI began piloting the exit survey in July 2007 and implemented it DOI-wide in October 2007. The exit survey is provided to all employees who voluntarily leaving the DOI. The web-based interview tool is being used to gather information on why employees leave and will provide concrete data for use in enhancing DOI's retention strategies.</p>	

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**FY 2007**

**Department of the Interior**

**STATEMENT OF  
CONDITION THAT  
WAS A TRIGGER FOR  
A POTENTIAL  
BARRIER:**

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

**Recruitment**

Census 2000 data identified seven groups within the Department's workforce that are below the civilian labor force benchmark. The groups are: Hispanic men and women, White women, African American men and women, and Asian men and women.

The same groups continue to be hired at rates below their participation in the national civilian labor force.

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

Analyses of overall workforce statistics for FY 2005, FY 2006 and FY 2007 Workforce Tables 715-A1, Total Workforce and 715-A8, New Hires. Reviewed information on recruiting methods of HR offices, including targeted recruitment plans.

**STATEMENT OF  
IDENTIFIED BARRIER:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

The Department's traditional methods of outreach and recruitment may not be sufficient to produce an increase in the participation rate of some groups within the agency's workforce.

**OBJECTIVE:** State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.

Redesign existing and/or create new approaches to the way the Department conducts outreach and recruitment to attract, hire and retain those groups with low participation rates within the Department's workforce.

**RESPONSIBLE  
OFFICIAL:**

Director, Office of Human Resources; Director, Office of Civil Rights; EEO and HR Officers; Directors and Office Heads; Managers and Supervisors

**DATE OBJECTIVE  
INITIATED:**

January 30, 2006

**TARGET DATE FOR  
COMPLETION OF  
OBJECTIVE:**

September 30, 2007  
Modified Date: December 30, 2008

### EEO Plan To Eliminate Identified Barrier

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1) OCR will designate program managers for the Black Employment Program, the Federal Women's Program, the Hispanic Employment Program, the Asian American/Pacific Islander Employment Program, and the American Indian/Alaska Native Employment Program for increased focus on groups of employees that have low participation rates in the Department's workforce.	June 30, 2006 Modified Date: September 30, 2007 <b>Completed</b>
2) EEO offices will provide demographics on the participation of women, minorities and persons with disabilities in the major occupations to servicing HR offices at the beginning of each fiscal year with periodic updates as the need arises.	October 30, 2006 Modified Date: October 30, 2008
3) HR offices will work with managers and supervisors in restructuring targeted recruitment plans for the identified major occupations with low participation rates.	March 30, 2007 Modified Date: September 30, 2008
4) Directors and Office Heads will monitor their organization's progress in successful outreach and recruitment.	October 30, 2007 Modified Date: October 30, 2008
5) EEO and HR offices will monitor effectiveness of outreach and recruitment activities and provide recommendations to management for change, if needed.	December 30, 2007 Modified Date: December 30, 2008
6) EEO and HR offices will ensure outreach to minority institutions of higher education and diverse professional and community-based organizations.	September 30, 2008
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	
<p>During FY 2007, the DOI invested resources and implemented strategies to assist in outreach and recruiting of women, minorities, and individuals with disabilities. Some of the strategies included: established linkage with the DisabilityInfo.gov website as a resource for individuals with disabilities; re-enforced communication and collaboration with employee-focused groups; and established/renewed cooperative partnerships with League of United Latin American Citizens, National Association for Equal Opportunity, and National Association of Hispanic Colleges and Universities for the purpose of strengthening outreach and recruitment to diverse segments of the labor force.</p>	



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<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p>	<p><b>Hiring and Placement</b></p>
<p>Provide a brief narrative describing the condition at issue.</p>	<p>The majority of the second-level components' MD-715 Reports reflect some employment practices that may not be conducive to creating an environment of free and open competition, equal access and non-discrimination.</p>
<p>How was the condition recognized as a potential barrier?</p>	<p>Some of the reported challenges included: lack of targeted recruitment plans; non-issuance of EEO policy statements; lack of equity in employees' receipt of awards; inconsistent recruitment for targeted disabilities; unfamiliarity with hiring practices and appointing authorities; failure to understand the prohibition on illegal reprisal; and lack of knowledge on reasonable accommodation.</p>
<p><b>BARRIER ANALYSIS:</b></p>	<p>Analysis of the agency's second-level components' FY 2005 MD-715 Reports and Plans. Reviewed Agency Self-Assessment Checklist, 715-01 Part G, deficiencies identified in Plan to Attain Essential Elements of a Model EEO Program, Part H, and EEO Plan to Eliminate Identified Barrier, Part I.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b> Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Managers and supervisors may not be fully aware of how to manage a diverse workforce.</p>
<p><b>OBJECTIVE:</b> State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Provide managers and supervisors with appropriate training so that they may understand and successfully discharge their duties and responsibilities to create an environment of equal employment opportunity, equal access and non-discrimination.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Director, Office of Civil Rights; Director, Office of Human Resources; Bureau/Office Heads; EEO and HR Officers; Managers and Supervisors</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>January 30, 2006</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2007 Modified Date: March 30, 2009</p>

### EEO Plan To Eliminate Identified Barrier

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
1) Managers and supervisors will attend EEO/Diversity training annually as required by the Departmental policy on Equal Opportunity.	September 30, 2008
2) Directors/Office Heads will monitor their managers' and supervisors' successful completion of the required EEO/Diversity training.	December 30, 2008
3) Directors/Office Heads will ensure that all newly appointed supervisors attend a basic supervision course that includes topics on supervisory responsibilities in EEO, diversity, and human capital management.	September 30, 2008
4) EEO offices will provide quarterly reports of component's workforce demographics to Director/Office Heads.	June 30, 2006 Modified Date: September 30, 2008
5) EEO offices will ensure availability of training, within funding constraints, on reasonable accommodation and disability laws to managers and supervisors.	September 30, 2008
6) EEO offices will use various media to distribute EEO policies, procedures and guidance concerning federal EEO laws, regulations and requirements to managers and supervisors.	December 30, 2008
7) HR offices will use various media to distribute personnel management policies, procedures and guidance concerning recruiting, hiring, training, career development, promotions, awards, retention, and disciplinary actions to managers and supervisors.	December 30, 2008
8) Managers and supervisors, in consultation with HR offices, will establish targeted recruitment plans for major occupations with low participation rates.	March 30, 2007 Modified Date: March 30, 2009
9) Managers and supervisors, in consultation with HR offices, will establish targeted recruitment plans for targeted disabilities.	December 30, 2006 Modified Date: December 30, 2008
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE	
<p>1) EEO offices continued to promote EEO/diversity training for managers and supervisors. During FY 2007, all components offered on-line or classroom training in EEO, diversity, reasonable accommodation or other EEO-related topics. EEO/Diversity courses were offered through the DOI University. In addition, all employees were required to take training on Discrimination and Whistleblowing in the Workplace (No FEAR Act).</p> <p>2) Training opportunities on personnel regulations, policies, and tools continue to be available to managers and supervisors through several sources. Training is offered through DOI University's courses, OHR sponsored OPM workshops, webcast and audio conferences, and management and leadership courses offered by bureaus/offices.</p>	

EEOC FORM  
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U.S. Equal Employment Opportunity Commission  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**  
**Special Program Plan for the Recruitment, Hiring, and Advancement of**  
**Individuals With Targeted Disabilities**

<b>PART I Department or Agency Information</b>	1. Agency	1. <b>U.S. Department of the Interior</b>					
	1.a. 2 <sup>nd</sup> Level Component	1.a.					
	1.b. 3 <sup>rd</sup> Level or lower	1.b.					

<b>PART II Employment Trend and Special Recruitment for Individuals With Targeted Disabilities</b>	Enter Actual Number at the ...	beginning of FY2007		end of FY2007		Net Change	
		Number	%	Number	%	Number	Rate of Change
	Total Work Force	*58,458	100.00	57,165	100.00	-1,293	-2.2%
	Reportable Disability	*4,378	7.5	4,201	7.3	-177	-4.0%
	Targeted Disability*	*623	1.1	596	1.0	-27	-4.3%
	* If the rate of change for persons with targeted disabilities is not equal to or greater than the rate of change for the total workforce, a barrier analysis should be conducted (see below). <b>*Changes in beginning FY2007 totals due to data verification.</b>						
	1. <b>Total Number of Applications Received From Persons With Targeted Disabilities</b> during the reporting period.					Not Available**	
2. <b>Total Number of Selections of Individuals with Targeted Disabilities</b> during the reporting period.					Not Available**		

**PART III Participation Rates In Agency Employment Programs**

Other Employment/Pers onnel Programs	TOTAL	Reportable Disability		Targeted Disability		Not Identified		No Disability	
		#	%	#	%	#	%	#	%
3. Competitive Promotions	Not Available								
4. Non-Competitive Promotion <b>Eligibles</b>	5,830	375	6.4	55	0.9	140	2.4	5,315	91.2
5. Employee Development/Training	Not Available**								
5.a. Grades 5 - 12	Not Available**								
5.b. Grades 13 - 14	Not Available**								
5.c. Grade 15/SES Development Training	Not Available**								

6. Employee Recognition and Awards	57,933	4,431	7.6	560	1.0	1,448	2.5	52,054	89.9
6.a. Time-Off Awards (Total hrs awarded)	168,279	10,866	6.5	1,853	1.1	3,854	2.3	153,559	91.2
6.b. Cash Awards (total \$\$\$ awarded)	59,680,729	3,848,911	6.4	413,889	.7	1,722,812	2.9	54,109,006	90.7
6.c. Quality-Step Increase	1,361	78	5.7	12	0.9	22	1.6	1,261	92.7
7. Details and Task Force Assignments	Not Available**								

<b>EEOC FORM 715-01 Part J</b>	<b>Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities</b>
<b>Part IV</b> Identification and Elimination of Barriers	See pages 27 - 28.
<b>Part V</b> Goals for Targeted Disabilities	See page 26.

**\*\* No Department-wide tracking system for this data.**

## DOI Special Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities

As of September 30, 2007, DOI employed a total of 596 individuals with targeted disabilities, or an on-board participation rate of 1.0%, which is below the Federal High of 2.2%. Additional FY 2007 data on the employment of individuals with targeted disabilities follows.

Accessions - 35 employees with targeted disabilities were hired into permanent positions, or 0.9% of all permanent hires.

Separations - 50 permanent employees with targeted disabilities voluntarily separated at a rate of 1.1%, which is greater than their on-board rate of 1.0%.

Non-competitive Promotions – 55 employees with targeted disabilities were eligible for career ladder promotions, or 0.9% of all non-competitive promotion eligibles.

The DOI Strategic Plan Diversity Goal calls for a 1% increase in diverse candidates hired. In alignment with the Diversity Goal, DOI strives to increase the participation of employees with targeted disabilities in its permanent workforce by 1%.

### Strategies:

- 1) Collaborate with bureaus/offices, federal agencies, and advocacy organizations to sponsor workshops, forums, and training sessions to educate managers, supervisors, and HR and EEO practitioners on the laws, regulations, initiatives, and special hiring authorities for individuals with disabilities as well as on the various resources, programs, and services available for the recruitment and employment of individuals with disabilities.
- 2) Advocate the use of various resources, programs, and services available for the recruitment, employment, and accommodation of individuals with disabilities, to include: State Vocational Rehabilitation agencies; Disability Services Offices at colleges and universities; Employer Assistance Referral Network (EARN); student employment authorities; Schedule A Hiring Authority; Workforce Recruitment Program (WRP); Department of Labor Office of Disability Employment Policy (ODEP); DOI/Department of Defense Computer/Electronic Accommodations Program; Veterans Administration special programs for service members; and Job Accommodations Network (JAN).
- 3) Develop and implement targeted recruitment plans to increase individuals with disabilities in the applicant pool.
- 4) Ensure all managers and supervisors are provided training on disability laws, EEOC guidance on reasonable accommodation, DOI policy on Reasonable Accommodation for Individuals with Disabilities, and the availability of assistive technology through DOI's Accessible Technology Center.
- 5) Promote EEOC's Leadership for the Employment of Americans with Disabilities (LEAD) Initiative. The initiative is designed to address the declining number of employees with targeted disabilities in the Federal workforce. Its goal is to increase the population of individuals with targeted disabilities to 2% by 2010 within all Federal agencies.

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<b>FY 2007</b> <b>Department of the Interior</b>	
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	<b>Reasonable Accommodation</b>  Analysis of reasonable accommodation issues and disability-related employment practices brought to the attention of the OCR shows that HR practitioners, managers, and supervisors are not fully aware of their duties and responsibilities as they relate to providing reasonable accommodation to individuals with disabilities.
<b>BARRIER ANALYSIS:</b> Provide a description of the steps taken and data analyzed to determine cause of the condition.	Analysis of statistical data from the DOI Annual Federal EEO Statistical Report of Discrimination Complaints (462 Report), showed the number of allegations of discrimination based on disability: FY 2005 had 115; FY 2006 had 110; and FY 2007 had 94. While the number of formal complaints has steadily declined for the past three years, more information on unresolved and inefficient processing of accommodation requests came to the attention of the DOI Disability Program Manager.
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	There is insufficient training for managers, supervisors, and HR practitioners on reasonable accommodation and disability law (the Rehabilitation Act), EEOC guidance and directives on reasonable accommodation for employees and applicants, and the Departmental procedures on handling requests for reasonable accommodation for individuals with disabilities.
<b>OBJECTIVE:</b> State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	Provide training on disability law and reasonable accommodation to managers, supervisors, and HR practitioners.
<b>RESPONSIBLE OFFICIAL:</b>	Director, Office of Civil Rights; Director, Office of Human Resources; EEO and HR Officers; Managers and Supervisors
<b>DATE OBJECTIVE INITIATED:</b>	January 30, 2006
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	March 30, 2007 Modified Date: December 30, 2008

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715-01 PART I

**EEO Plan To Eliminate Identified Barrier**

<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
1) EEO offices will ensure that training on disability and reasonable accommodation is available to all managers, supervisors and HR practitioners.	September 30, 2008
2) On a quarterly basis, the ATC will conduct demonstrations, for managers and supervisors, on assistive technology accommodations for present and potential employees in support of recruitment and retention of employees with disabilities.	October 30, 2006 Modified Date: December 30, 2008
3) The Disability Program Manager (DPM) will develop a reporting system for components to report disposition of reasonable accommodation requests.	September 30, 2006 Modified Date: April 30, 2007 <b>Completed</b>
4) EEO offices will provide an annual report on the disposition of reasonable accommodation requests to the DPM.	February 15, 2008 <b>Completed</b>
5) The DPM will conduct annual assessment of accommodation decisions, identify trends, and make recommendations to Director, Office of Civil Rights.	September 30, 2008
6) The Disability Rights Coordinating Committee will re-define its charter for the advocacy of equal employment benefits to and access for individuals with disabilities.	March 30, 2008 <b>Completed</b>

**REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

- 1) During FY 2007, seven out of nine DOI components offered on-line or classroom training on the provision of reasonable accommodation to employees with disabilities. Also, training opportunities were provided to managers, supervisors, HR and EEO practitioners, and employees as part of the DOI observance of Disability Employment Awareness Month.
- 2) The Office of Civil Rights established a tracking and reporting system for the disposition of reasonable accommodation requests. DOI components reported 373 requests for reasonable accommodation were received in FY 2006. Ninety-two percent of all requests were granted and 88% of all requests were processed in accordance with procedures and timelines set forth in DOI policy.
- 3) DOI employees were provided free accommodations, largely assistive technology, through the DOI agreement with the Department of Defense Computer/Electronics Accommodation Program (CAP). CAP provided 135 accommodations (valued at approximately \$85,899) to DOI employees, at no cost to DOI.
- 4) Through cooperative efforts between DOI and OPM, in January 2007, the DOI conducted a re-survey of its workforce. Employees self-identified their ethnicity, race, and disability status using OPM's Employee Express.